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11 UNITED STATES DISTRICT COURT
12 DISTRICT OF NEVADA

13 Paul Santiago,

14 Petitioner,

15 v.

16 State of Nevada,

17 Respondent.

Case No. 2:21-cv-00896-APG-NJK

**Unopposed motion for extension of
time in which to file Reply to
Answer**

(Second request)

18 Petitioner Paul Santiago respectfully moves this Court for an extension of time
19 of 60 days, from May 9, 2024, to and including July 8, 2024, in which to file his Reply
20 to the Answer.
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POINTS AND AUTHORITIES

Mr. Santiago filed a *pro se* petition for writ of habeas corpus on or about May 4, 2021.¹ Counsel filed a First Amended Protective Petition on August 18, 2021.² Counsel simultaneously sought leave to file a Second Amended Petition, which the Court granted.³ Mr. Santiago filed his Second Amended Petition on July 13, 2022.⁴ Respondents filed their Motion to Dismiss on January 27, 2023.⁵ Mr. Santiago filed his Opposition to the Motion to Dismiss on May 25, 2023.⁶ This Court issued its order on the Motion on September 25, 2023.⁷ The Court then dismissed Ground One on October 23, 2023, and ordered Respondents to answer the remaining claims.⁸ Respondents filed their Answer on December 11, 2023.⁹ Mr. Santiago now requests additional time to file his Reply. This is the second request for an extension of time. The additional period of time is necessary in order to effectively represent Mr. Santiago. This motion is filed in the interests of justice and not for the purpose of unnecessary delay.

The extension is needed due to undersigned counsel's additional case-related obligations since the previous extension request. These include drafting a Reply in *Emanuel, Jr. v. Neven*, 2:16-cv-1368-GMN-EJY; a DNA Petition in *Pineda v. Gittere*, 08C248583; a settlement letter in *Emanuel v. Collins, et al.*, 3:20-cv-00566-RCJ-CLB; and a Reply Brief in *Orduna v. Garrett*, 23-15313, among other pleadings. Counsel

¹ ECF No. 1-1 at 1.

² ECF No. 11.

³ ECF No. 13.

⁴ ECF No. 27.

⁵ ECF No. 67.

⁶ ECF No. 73.

⁷ ECF No. 77.

⁸ ECF No. 79.

⁹ ECF No. 83.

1 also spent substantial time preparing for an evidentiary hearing in *Durr v. Warden*,
2 A-23-873441-W, on April 17, 2024, and a settlement conference in *Emanuel v. Collins*,
3 *et al.*, 3:20-cv-00566-RCJ-CLB, on April 24, 2024. In addition, counsel has had several
4 prison visits, and was on leave from April 29 to May 10.

5 On May 9, 2024, counsel for Respondents, Deputy Attorney General Michael
6 Shaffer, indicated by email that Respondents do not oppose this request.

7 For the above stated reasons, Mr. Santiago respectfully requests this Court
8 grant an extension of time of 60 days and order the Reply to be filed on or before July
9 8, 2024.

10 Dated May 9, 2024.

11 Respectfully submitted,

12 Rene L. Valladares
13 Federal Public Defender

14 /s/ Laura Barrera
15 Laura Barrera
16 Assistant Federal Public Defender

17 ORDER

18 The extension is granted, but no further extensions will be granted absent
19 extraordinary circumstances.

20 IT IS SO ORDERED:

21 Dated: May 10, 2024

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23 ANDREW P. GORDON
24 UNITED STATES DISTRICT JUDGE
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